



From: Emily Taylor
To: Vanessa Baehr-Jones
Cc: JCPDteam; danny; Kristin E. Berexa; Rachel Nottingham; kgrant; L. Rufolo; Aaron Wells; Ben C. Allen; Maria Ashburn; ilakey
Subject: Re: BP, HA, and SH v. City of Johnson City et al.: Plaintiffs' AT&T Subpoena
Date: Monday, August 12, 2024 4:02:04 PM

Vanessa,

I do not intend to file a motion regarding the ATT Subpoena which, to my knowledge, is not a number associated with the City or JCPD.

Thanks,

Emily

From: Vanessa Baehr-Jones <vanessa@advocatesforsurvivors.com>
Sent: Monday, August 12, 2024 3:48 PM
To: Emily Taylor <etaylor@watsonroach.com>
Cc: JCPDteam <JCPDteam@hmccivilrights.com>
Subject: Re: BP, HA, and SH v. City of Johnson City et al.: Plaintiffs' AT&T Subpoena

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Emily,

I appreciate your time today. Just to recap, I stated during the meet and confer that we were no longer comfortable going through the City for third party subpoenas because of numerous examples now where we have received untimely and incomplete discovery from the City. I agreed to designate any phone records we receive from these subpoenas confidential initially and then work with the City on redacting any personal, nonrelevant data before de-designating any portion of the call logs. You stated that the City would be filing a motion for protective order regarding the JCPD issued phone numbers and Hilton's personal cell phone number, but not regarding the phone number (████) █████-████16. Although this did not come up, I assume you likewise will not be moving regarding the ATT subpoena which is also for a non-JCPD phone number.

Have a good evening,
Vanessa

On Mon, Aug 12, 2024 at 12:04 PM Emily Taylor <etaylor@watsonroach.com> wrote:
Yes. That is better for me as well.

From: Vanessa Baehr-Jones <vanessa@advocatesforsurvivors.com>
Sent: Monday, August 12, 2024 2:58 PM
To: Emily Taylor <etaylor@watsonroach.com>

Subject: Re: BP, HA, and SH v. City of Johnson City et al.: Plaintiffs' AT&T Subpoena
Emily,

Could we push this back to 12:15? Best number for me is (510) 500-9634.

Thanks,
Vanessa

On Mon, Aug 12, 2024 at 11:45 AM Emily Taylor <etaylor@watsonroach.com> wrote:
Vanessa -

I don't think anyone else will be joining us. Send me the best number to reach you,
and I will contact you directly.

Thanks,

Emily

From: Vanessa Baehr-Jones <vanessa@advocatesforsurvivors.com>
Sent: Monday, August 12, 2024 1:07 PM
To: Emily Taylor <etaylor@watsonroach.com>
Cc: Erica Russell <erica@hmccivilrights.com>; danny <danny@moorerader.com>; jlakey <jlakey@bpjlaw.com>; Kristin E. Berexa <kberexa@fbb.law>; kgrant <kgrant@rswlaw.com>; Ben C. Allen <ballen@fbb.law>; andre@moorerader.com <andre@moorerader.com>; L Rufolo <lrufolo@rswlaw.com>; Aaron Wells <awells@rswlaw.com>; Marie Chrisman <mchrisman@bpjlaw.com>; Maggie Sutton <msutton@fbb.law>; Maria Ashburn <mashburn@watsonroach.com>; Sandy Vite <sandy@hbm-lawfirm.com>; Heather Collins <heather@hmccivilrights.com>; Elizabeth Kramer <elizabeth@eko.law>; Kevin Osborne <kevin@eko.law>; Julie Erickson <julie@eko.law>; Linda Oxford <linda@eko.law>; Ashley Walter <ashley@hmccivilrights.com>; Iliana Arbeed <iliana@eko.law>
Subject: Re: BP, HA, and SH v. City of Johnson City et al.: Plaintiffs' AT&T Subpoena
Emily,

I am available for a meet and confer at 3 pm Eastern today.

Can you circulate a conference line if you anticipate others joining?

Thanks,
Vanessa

Sent from my iPhone

On Aug 12, 2024, at 9:57 AM, Emily Taylor <etaylor@watsonroach.com> wrote:

Vanessa,

Respectfully, this is not a true third-party subpoena as to three of the numbers. The subpoena also seeks information that you have not requested in a discovery request. If you do not intend to honor our prior agreement regarding Verizon records for JCPD employees, I request a meet and confer before you issue the subpoena. I am available this afternoon between 3pm and 5pm ET or tomorrow morning between 10am ET and 1pm ET.

Thank you,

Emily

From: Vanessa Baehr-Jones <vanessa@advocatesforsurvivors.com>
Sent: Monday, August 12, 2024 12:49 PM
To: Emily Taylor <etaylor@watsonroach.com>
Cc: Erica Russell <erica@hmccivilrights.com>; danny <danny@moorerader.com>; jlakey <jlakey@bpilaw.com>; Kristin E. Berexa <kberexa@fbb.law>; kgrant <kgrant@rswlaw.com>; Ben C. Allen <ballen@fbb.law>; andre@moorerader.com <andre@moorerader.com>; L Rufolo <lrufolo@rswlaw.com>; Aaron Wells <awells@rswlaw.com>; Marie Chrisman <mchrisman@bpilaw.com>; Maggie Sutton <msutton@fbb.law>; Maria Ashburn <mashburn@watsonroach.com>; Sandy Vite <sandy@hbm-lawfirm.com>; Heather Collins <heather@hmccivilrights.com>; Elizabeth Kramer <elizabeth@eko.law>; Kevin Osborne <kevin@eko.law>; Julie Erickson <julie@eko.law>; Linda Oxford <linda@eko.law>; Ashley Walter <ashley@hmccivilrights.com>; Iliana Arbeed <iliana@eko.law>
Subject: Re: BP, HA, and SH v. City of Johnson City et al.: Plaintiffs' AT&T Subpoena Emily,

Thank you for the offer but we will be serving this subpoena and all other third party subpoenas issued on behalf of Plaintiffs ourselves going forward.

-Vanessa

Sent from my iPhone

On Aug 11, 2024, at 1:46 PM, Emily Taylor
<etaylor@watsonroach.com> wrote:

Plaintiffs' Counsel:

Three of these numbers are either personal or work phones for three JCPD employees. Pursuant to our prior agreement regarding the Verizon records, I request that you allow me to send the subpoena out on Monday for the following numbers:

1. [REDACTED] 91 (JC issued phone)
2. [REDACTED] 69 (JC issued phone)
3. [REDACTED] 63 (Personal Phone for David Hilton)

Pursuant to our agreement, I will designate the JCPD issued records "Confidential" and the personal records "Attorney's Eyes Only." Given that we are only dealing with a few numbers, it shouldn't take me more than a few days to get the records to you once I receive them.

While the 4th is not a JCPD number (to my knowledge), I am happy to include that one on my subpoena to save you from having to send one out as well.

Let me know if you are agreeable to this, and I will make sure the subpoena goes out on Monday.

Thanks,

Emily

Emily C. Taylor

865-637-1700 (office)

865-525-2514 (fax)

etaylor@watsonroach.com

<image004.png>

<image005.png><image006.png><image007.png>

Watson, Roach, Batson, Rowell & Lauderback, P.L.C.
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IMPOSED UNDER UNITED STATES FEDERAL TAX LAWS.

From: Erica Russell <erica@hmccivilrights.com>

Sent: Friday, August 9, 2024 12:11 PM

To: danny <danny@moorerader.com>; Emily Taylor
<etaylor@watsonroach.com>; jlakey <jlakey@bpjlaw.com>;
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andre@moorerader.com; L Rufolo <lrufolo@rswlaw.com>; Aaron
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<mchrisman@bpjlaw.com>; Maggie Sutton <msutton@fbb.law>;
Maria Ashburn <mashburn@watsonroach.com>; Sandy Vite
<sandy@hbm-lawfirm.com>

Cc: vanessa <vanessa@advocatesforsurvivors.com>; Heather
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Erickson <julie@eko.law>; Linda Oxford <linda@eko.law>; Ashley
Walter <ashley@hmccivilrights.com>; Iliana Arbeed
<iliana@eko.law>

Subject: BP, HA, and SH v. City of Johnson City et al.: Plaintiffs'
AT&T Subpoena

Good morning,

Attached please find a subpoena to AT&T for service on Monday,
August 12.

Thank you,

<image001.png>
<image010.png>

Erica Russell
OFFICE MANAGER & SR. PARALEGAL
615.724.1996
7000 Executive Center Dr. #320
Brentwood, TN 37027

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Vanessa Baehr-Jones
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